

Law Office
JAMES W. DEMPSTER
118 EAST MAIN STREET
P.O. Box 332
McMINNVILLE, TENNESSEE 37111-0332
TELEPHONE: (931) 473-4934
FAX: (931) 473-7190

REC'D TN
REGULATORY AUTH.
'99 APR 16 AM 8 59
OFFICE OF THE
EXECUTIVE SECRETARY

April 14, 1999

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Mr. Waddell:

Re: Petition of Ben Lomand Rural Telephone
Cooperative, Inc. for Approval of An
IntraLATA Toll Dialing Parity
Implementation Plan, Docket No. 99-00259

Enclosed is an original and 13 counterparts of the petition of Ben Lomand Rural Telephone Cooperative, Inc. requesting that the Authority consider and approve a certain IntraLATA Toll Dialing Parity Implementation Plan which is incorporated into the petition by reference and is attached to the petition as Exhibit 1.

One of the counterparts is to be stamped with the filing date for my file and returned to me in the self-addressed stamped envelope enclosed. The remaining counterparts are for the use of the Tennessee Regulatory Authority and its staff.

If there is additional information or modification which the directors or the staff of TRA might feel would be of assistance to the Authority, I would appreciate your getting in touch with me at your earliest convenience.

Very truly yours,

James W. Dempster
James W. Dempster

JWD:rml

Enclosures

c: Robert W. Jones, Pres., BLRTC
Levoy Knowles, Mgr., BLRTC

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.
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OFFICE OF THE
EXECUTIVE SECRETARY

IN RE:

PETITION OF BEN LOMAND RURAL
TELEPHONE COOPERATIVE, INC. FOR
APPROVAL OF AN INTRALATA TOLL DIALING
PARITY IMPLEMENTATION PLAN)
)
)
)

Docket No.

99-00259

PETITION OF
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.
FOR APPROVAL OF AN INTRALATA TOLL DIALING PARITY
IMPLEMENTATION PLAN

Ben Lomand Rural Telephone Cooperative, Inc., hereinafter referred to as BLRTC, petitions the Tennessee Regulatory Authority (the "TRA" or "Authority") for approval of its intraLATA toll dialing parity implementation plan, which is attached to this petition and designated as Exhibit 1 and referred to as Exhibit 1 in this petition and incorporated into the said petition by reference, and would respectfully show the Authority as follows:

1. Ben Lomand Rural Telephone Cooperative, Inc. is an Eligible Telecommunications Carrier ("ETC") in its incumbent local exchange carrier ("LEC") service area with authority to provide local exchange telecommunications services in certain areas of the state of Tennessee.
2. The Telecommunications Act of 1996, Section 251(b)(3), which is codified in Section 47 U.S.C. § 251(b)(3) provides:

(3) DIALING PARITY.--The duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service, and the duty to permit all such providers to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays.

BLRTC has been advised that even though it is not classified and has specifically been excluded as a utility under the laws of the state of Tennessee, that under the rules and regulations of the Federal Communications Commission, it is considered a LEC, and the Federal Communications Commission ("FCC") has directed that no later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the State Regulatory Commission (in Tennessee, the Tennessee Regulatory Authority) for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. BLRTC has not heretofore filed such a plan.

3. The Federal Communications Commission ("FCC") in compliance to Section 251(b)(3) has adopted rules for the implementation of toll dialing parity, a concept that is similar to its local exchange carrier equal access implementation rule. BLRTC offers equal access for interstate and intraLATA calls to those interexchange carriers who have qualified and notified BLRTC of their desire to furnish long distance service to the BLRTC members and/or patrons.

4. BLRTC has developed an intraLATA toll dialing parity implementation plan which has been incorporated into this petition by reference, and it avers and believes that it complies with all of the required elements and the promulgated rules for implementation set out by the Federal Communications Commission along with the rules and regulations of the Tennessee Regulatory Authority.

PREMISES CONSIDERED PETITIONER PRAYS:

1. The Tennessee Regulatory Authority consider and approve its intraLATA toll dialing parity implementation plan set out as Exhibit 1 to this petition.

2. The Tennessee Regulatory Authority notify the Federal Communications Commission or such other governmental agency as it may be required to do of the filing of this petition or plan approval; and,

3. The Authority grant the petitioner, Ben Lomand Rural Telephone Cooperative, Inc., such other, further, and general relief as the Authority might consider it entitled to under the premises.

DATED: This 14 day of April, 1999.

Respectfully submitted,

BEN LOMAND RURAL TELEPHONE
COOPERATIVE, INC.

By: Levoy Knowles
Levoy Knowles, General Manager
311 N. Chancery Street
McMinnville, TN 37110

James W. Dempster
James W. Dempster, Attorney for
Ben Lomand Rural Telephone Coop., Inc.
118 E. Main Street
P.O. Box 332
McMinnville, TN 37111-0332
Phone: (931) 473-4934
Fax: (931) 473-7190

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing petition on behalf of Ben Lomand Rural Telephone Cooperative, Inc. via United States Mail, first class postage prepaid, and properly addressed to the following:

AT&T Communications

**Gary Andraza, Assistant Vice President
Government Affairs**
511 Union Street, Suite 700
Nashville, TN 37219
(615) 242-2815

BellSouth Telecommunications, Inc.

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300
(615) 214-6301

Ben Lomand Communications, Inc.

Joe C. Roper, President
212 Hillsboro-Viola Rd.
Hillsboro, TN 37342
(931) 668-1010

Citizens Communications

J. Michael Swatts
State Regulatory Director-South
300 Bland Street
P.O. Box 770
Bluefield, WV 24701
(304) 325-1216

Frontier Communications Services

Scott Nichols, Senior Manager
Regulatory Affairs
1990 M. Street, N.W. Suite 500
Washington, D.C. 20036
(202) 293-0593

ICG Telecom Services, Inc.

Michael McCaw
315 Deaderick Street, Suite 2150
Nashville, TN 37238
(615) 251-4440

MCI Telecommunications Corporation

Kathy Pounds, Director

Law and Public Policy

780 Johnson Ferry Road, Suite 700

Atlanta, GA 30342

(404) 250-5500

Sprint Communications Company, L.P.

Tony Key, Director

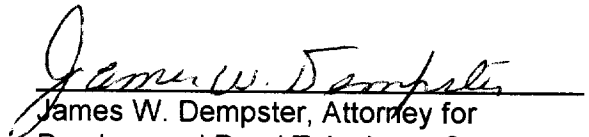
State Regulatory

3100 Cumberland Circle

Atlanta, GA 30339

(404) 649-5144

This 14 day of April, 1999.


James W. Dempster, Attorney for
Ben Lomand Rural Telephone Coop., Inc.

BEN LOMAND RURAL TELEPHONE COOP., INC.

IntraLATA Toll Dialing Parity Implementation Plan

June 1, 1999

Implementation Date

BEN LOMAND RURAL TELEPHONE COOP., INC.

McMinnville, Tennessee

April 13, 1999

Exhibit 1 to the Petition of BEN LOMAND RURAL TELEPHONE COOP., INC. to the Tennessee Regulatory Authority for Approval of the subject plan.

I. Purpose

Ben Lomand Rural Telephone Cooperative, Inc. (Ben Lomand) has described herein the process for implementing intraLATA toll dialing parity in the Ben Lomand exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the participating telecommunications carrier of their choice for routing their intraLATA toll calls.

II. IntraLATA Environment

Ben Lomand customers in Tennessee in the Ben Lomand area can currently dial an access code to complete intraLATA toll calls to another carrier. After implementation of the intraLATA toll dialing plan, customers will be able to subscribe to the carrier of their choice for intraLATA as well as interlata service (two-PIC subscription capability). Customers will dial 1+ the area code and number to complete calls using their subscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code.

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA toll calls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carrier's via an order from the Tennessee Public Service Commission. BellSouth currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by Ben Lomand intraLATA toll customers and to ensure that billing does not occur on these calls. Ben Lomand will continue to process toll-free intraLATA county-wide calls in this manner for toll customers after implementation of intraLATA toll dialing as long as technically feasible.

III. Implementation Schedule

Ben Lomand will provide intraLATA toll dialing parity in Tennessee on June 1, 1999.

IV. Carrier Selection Procedures

Ben Lomand will implement the full Two-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full two-PIC methodology, customers will be able to subscribe to one telecommunications carrier for interLATA toll calls and subscribe to the same or a different participating telecommunications carrier, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

Ben Lomand employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain to customers the process for making PIC changes for intraLATA toll calls. Business Office personnel and the Customer Account Records system will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

Existing Customers

Currently, the Local Exchange Carrier is the only subscribed intraLATA toll provider for existing customers in Ben Lomand's local exchange area. On June 1, 1999, customers may subscribe to any telecommunications carrier offering intraLATA toll service in their exchange. Customers will remain with the Local Exchange Carrier until they affirmatively choose an intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their choice of carriers to Ben Lomand directly or through their selected carriers.

Customers will be assessed a PIC change charge for changing their intraLATA carrier at a rate of \$5.00. When customers request a simultaneous change to the same carrier for their interstate and intrastate service, Ben Lomand will assess two PIC charges one from the interstate tariff and one from the intrastate tariff.

A charge will be established for unauthorized PIC changes submitted by carriers to Ben Lomand for end-user customers (slamming).

New Installation Customers

Ben Lomand customer contact representatives will be provided discussion guidelines that will provide a new customer with the following information:

1. Inform the customer that a choice of intraLATA toll providers is now available to him or her.
2. Offer to read the customer a list of available carriers in randomly generated order.
3. Advise the customer that various carriers provide intraLATA toll service.

Customers who do not make a positive choice for an intraLATA toll carrier will be notified that they will not be automatically defaulted to a carrier and will be required to dial an access code to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

PIC Charge Waiver Period

Customers will be given a period of ninety (90) days within which to make one change of their preferred carrier at no cost to the customer. This waiver period will begin on June 1, 1999. The costs associated with this waiver will be recovered through the general cost recovery mechanism.

V. Customer Education/Notification

At the time of implementation, June 1, 1999, the TRA will issue a press release announcing the availability of intraLATA 1+ subscription. This press release will announce the opportunity to choose a primary intraLATA carrier and explain the 90 day waiver period from June 1, 1999 through August 31, 1999.

Ben Lomand will notify all existing end users via a direct mailing and a bill message regarding intraLATA subscription implementation and explain their opportunity to select an intraLATA carrier. The wording of the customer notification includes an explanation of the PIC change charge waiver period and is shown as Exhibit A. Customer telephone directories will be updated as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier. After implementation, all new customers will be advised of intraLATA availability and requested to make an intraLATA carrier selection.

VI. Carrier Notification

Current interexchange carriers will be notified of Ben Lomand intraLATA toll dialing parity implementation via Certified U. S. Mail at implementation. Carriers that currently participate in interlata toll will be assumed to be participants in the intraLATA toll market. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying Ben Lomand.

Ben Lomand offers Ben Lomand Listed Name and Address and Ben Lomand Change Activity Register services for the purpose of assisting the carrier's marketing efforts in connection with marketing their telecommunications services. Ben Lomand Listed Name and Address service provides a list of customers available for subscription within Ben Lomand central offices. The data base is updated monthly.

VII. Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard exist for access to Operator Services and Directory Assistance unique to intraLATA services. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

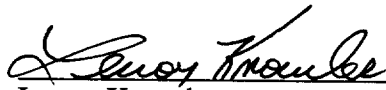
VIII. Cost Recovery

In accordance with 51.215 of FCC Order 96-333, CC Docket No. 96-98, cost recovery for the incremental cost of dialing parity; specific switch software, and necessary hardware and signaling system upgrades, and customer education costs that are strictly necessary to implement dialing parity, will be implemented in a competitively neutral manner across all providers of telephone exchange service a telephone toll service in the area served by Ben Lomand. Incremental costs will be recovered from all carriers through a rate element based upon originating intrastate switched access minutes of use (MOUs) during the 4 year cost recovery period. Attached, as Exhibit B, is a detailed explanation of the Cost Recovery methodology. An annual true-up will be conducted and reported to the TRA.

IX. Statement of Compliance

Ben Lomand will comply with all rules of the FCC and the TRA.

Executed as of the 13th Day of April, 1999



Levoy Knowles
General Manager of BLRTC
311 North Chancery Street
P. O. Box 670
McMinnville, TN 37111
Phone: 931-668-4131

Exhibit A

BILL MESSAGE

"Ben Lomand implemented local toll 1+ subscription service on June 1, 1999. You are now able to choose a local toll provider. Your current carrier will continue to provide this service for you or you may select another carrier. You may select the same provider as your interstate long distance service provider or you may select a different provider for each service. Your first selection prior to August 31, 1999, will be free."

DIRECT MAILING

IMPORTANT NOTICE ABOUT LOCAL TOLL SERVICE

"As of June 1, 1999, you are able to choose your provider of "1+" local toll service. This change allows you to remain with your current carrier or select a different long distance carrier for local toll calls. Please refer to the information pages in the front of your Ben Lomand telephone directory under "Long Distance - Calling Area" for a description of your local toll calling area.

If you would like to select a different carrier for your "1+" local toll service, you should contact that company. No action is necessary to keep current your provider for these local toll calls.

From June 1, 1999 until August 31, 1999 you will be able to change your local toll carrier one time without charge. There may be a charge for each subsequent change you make in local toll companies."

TENNESSEE
MEHODOLOGY FOR RECOVERY OF COSTS
ASSOCIATED WITH
IMPLEMENTATION OF INTRALATA SUBSCRIPTION

CALCULATION OF INITIAL EQUAL ACCESS RATE ELEMENT

Step 1: Identify the estimated total incremental costs directly attributable to the provisioning of IntraLATA Subscription.

\$87,446.18

Step 2: Identify estimated total Intrastate/IntraLATA minutes of use for the 4 year recovery period.

134,609,788

Step 3: Calculate a cost recovery rate by dividing amount in Step 1 by the Minutes of Use in Step 2.

\$0.00065

ANNUAL TRUP-UP OF EQUAL ACCESS RATE ELEMENT

Repeat Steps 1 through 3 and calculate an updated access rate element by dividing amount in Step 1, adjusted by the previous year/years cost recovery.